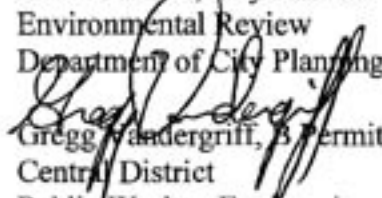


CITY OF LOS ANGELES
INTERDEPARTMENTAL CORRESPONDENCE

Agenda Item 13
SMMC
8/27/07

Date: March 19, 2007

To: Hadar Plafkin, City Planner
Environmental Review
Department of City Planning

From:  Gregg Vandergriff, Permit Manager
Central District
Public Works - Engineering

Subject: Tract No. 35022 – Council Motion Relative to EIR 172-84 (SUB) (REC) – CF 04-1413

The above referenced Council File asks the Departments and Bureaus of City Planning (DCP), Building and Safety (LADBS), and Public Works – Bureau of Engineering(BOE) to investigate and report whether the most recent grading plans, and designs for the Pueblo Subdivision (TR - 35022) evaluated against the previous Environmental Impact Report (EIR 172-84 (SUB) (REC)) and its associated Statement of Overriding Considerations trigger the need for a subsequent or supplemental Environmental Impact Report (EIR); whether all feasible mitigation measures, in light of substantial changes to the project and new information, have been incorporated into the Pueblo Subdivision project; and whether any other circumstances exist that would merit conducting further environmental review. (See Attached Motion).

The council motion expressed that "From the time of approval there have been significant changes to the Pueblo Subdivision project that appear to trigger the need for additional environmental review, including 1) incorporation of adjacent properties, and other subdivision tracts and maps into the grading plan for the Pueblo Subdivision and 2) expanded Grading and street construction that exceeds the original tract boundaries, plans and project description."

Further the motion states that, "Since certification of the previous Environmental Impact Report, new information that was not or could not have been known at the time of approval of the Pueblo Subdivision has come to the fore, including new information on the hydrology of the hillside and the presence of an extensive, natural subterranean water system."

The Department of Public Works, Bureau of Engineering (BOE) in conjunction with the Department of Building and Safety (LADBS) has reviewed the grading plans for the proposed project. BOE and LADBS compared the Project Description, Environmental Impact Analysis – Earth and Water Sections and Attachments with the plans submitted for design review and approval. BOE and LADBS also reviewed Soils and Geology reports and Hydrology and Hydraulics reports for the project. Summarized below are the findings of the two departments with respect to the size of the work.

Scope of Work

The proposed project plans identify 24 lots for construction of single family residences. Incorporated into the plan is the construction of Lathrop St., Pullman St., and Pueblo Ave. Also included is Parcel Map AA-2005-849 filed with DCP and decision issued on September 30, 2005. DCP issued for this parcel map a Mitigated Negative Declaration (MND). ENV-2005-850-MND. The conditions of that approval for two lots within and one adjacent to the project also required the construction of Pueblo Avenue. That is the only action that has added acreage to the project.

The original Tentative Tract Map is used as a base line for the amount of grading required on this project. This map did not include limitations on the height of retaining walls, limitations due to the maximum allowed grades or any other mitigation measures or conditions required as part of the tract conditions.

VTTM 35022 – 1992 Cut – 156,000 CY Fill – 71,000 CY Export – 85, 000 CY

In November of 2003 the City approved Modification #1 to the recorded Tract Map. This modification did not add acreage to the project but altered street alignments and lot lines. The result was that approximately 245, 000 cubic yards of dirt would be displaced. It is broken down as follows:

Modification #1: Cut - 221,524 CY Fill - 244,652 CY

Subsequent to this action the grading plan was submitted to LADBS for approval of the on-site grading. After review and modification to comply with city codes the quantities of dirt to be moved are estimated at approximately 285,000 cubic yards. It is broken down as follows:

Revised Grading Plan: Cut - 284,700 CY Fill - 203,100 CY

Off-site grading requires extensive movement of dirt around the construction area for the construction of Pullman St. and Pueblo Ave. Those quantities are estimated at:

Pullman: Cut - 85,300 CY, Fill - 15,000 CY

Pueblo: Cut - 0 CY, Fill - 145,300 CY

The total quantities of dirt to be relocated within this project including the construction of Pullman St, Pueblo Ave, Lathrop St, and the tract building pads are estimated at:

B permit Grading: Cut – 370,000 CY Fill – 364,000 CY

Finally the above referenced quantities do not require any export of fill from the project area except for that material which cannot be used as fill and must be removed from the site per building code. The amount of material to be so removed is not estimated.

The EIR defined the scope of work for this project on page 1, paragraph 1 as follows:

The project being evaluated includes the subdivision of the 15.70 gross acre (11.56 net acre) project site into 24 residential lots, as well as construction of roadways to serve the project area, extension of Pullman Street and possible construction of 24 single-family residences on the lots.

In the next paragraph it states, "This re-subdivision of the property is requested in order to provide for a street system which meets today's standards for adequate access, street widths, and engineering design."

The following paragraph states, "The approval of a haul route for 85,000 cubic yards of soil is also sought."

On page 2 of the report it is noted that the project was previously submitted as a proposed 30 lot subdivision on 18.67 gross acres. The Environmental Review Committee (ERC) required the original project to prepare an EIR and to consider several issues and items. Specifically the ERC also required that the cumulative impact of the project, together with the vacant parcels surrounding the site be assessed with relation to exiting and proposed projects in the area.

Page 31 paragraph 1 defines this as follows: "The site is part of a larger (110 acre) undeveloped site adjacent to a residential area of single- and multi- family homes.

Paragraph 2 states: "Eighty percent of the area will be landscaped. Another 10 percent will be for roadways and only 10 percent will be built upon."

Paragraph 3 states: "The preliminary grading plan for the project is shown in Figure 4. The project will result in the export of approximately 85,000 cu yards of soil."

The Environmental Analysis identified the grading as a significant impact to the site. On page 37 paragraph 1 it stated, "Significant soil movement is anticipated – approximately 100,000 cubic yards would be moved with approximately 85,000 cubic yards of dirt exported and 15,000 cubic yards remaining on the site as fill."

Lower in the same paragraph it stated, "It cannot be determined at this time to where and by what route the exported material would be transported."

On page 38 of the report in the same section, the second paragraph it stated, "Off-site grading will be required for the construction of Pueblo Avenue."

The first Mitigation Measure of this section called for "All grading shall be performed under supervision of a licensed engineering geologist and/or soils engineer in accordance with applicable provision of the Municipal Code and the recommendations of the City Engineer and the Superintendent of Building."

On page 40 of the report it states under the Adverse Impacts section, "The alterations of the ridge lines and transportation 85,000 cubic yards of soil off the site.

The following Cumulative Impacts section states, "Landform alteration will occur in conjunction with other related projects."

In the Right-of-Way and Access section of the report, on page 52 paragraph 1 identifies Lathrop Street and Pullman Street as the means of access to the site for residents. In the second paragraph it defines on-site streets for the project to be constructed as Glidden Drive, Ringgold Drive, and Corona Drive. It further calls for merging the existing rights of way in order to provide and allow for the construction of a street system which meets today's standards for adequate access, street widths, and engineering design.

On page 53 in the Mitigation Measures 3rd bullet it states, "Pullman Street shall be improved for two lanes of traffic between the proposed subdivision and Harriman Avenue to provide the main access to the site.

Section X Planning Department Documentation – Part A Environmental Data Requirement page 101 identifies grading as a significant impact. Specifically it identifies that "grading of approximately 250,000 cu yds of dirt which will be exported" as the impact.

The work sheet found in the above section on page 107 identifies grading of approximately 250,000 cu yds. of dirt.

The above references make no indication if Pullman St and Pueblo Ave were included in the calculations for the quantities of earth work to be performed. Likewise there is no distinction made whether the quantities lumped cut and fill together or if only the cut portion was used to make the calculations. It seems likely though that only the cut portion was reported because the report makes reference to exporting the material.

The proposed construction of Pullman Avenue called for construction of two lanes of roadway within the existing right of way. This straight line alignment necessitated the construction of off-site retaining walls ranging in height from six feet to forty feet or more and significant side slope grading in order to meet the required grades of the public street. To mitigate this impact and to make the retaining walls conform to the criteria of the retaining wall ordinance a re-alignment of Pullman Street was proposed by the developer. This re-alignment was approved through An Offer to Dedicate Easement for Street Purposes in Council on September 28, 2005 and reaffirmed the above referenced EIR. (CF 05-1524).

Offsite retaining walls ranging in height from six feet to twenty-eight feet would also have been required to support the roadways surrounding the tract map. Reducing the height of the retaining walls increased the grading.

The proposed streets shown in the original exhibit do not identify the grades for the streets or other slopes. Today BOE requires a maximum grade of 15% for all newly designed streets. This grade limitation is necessary to provide safe access for emergency equipment including fire trucks. This also limits the minimum turn radius allowed for a public street as well as the minimum width. These standards when applied to the plan mandate the amount of grading or the size of retaining wall necessary to match changes in elevation between the street and natural topography.

An Exhibit has been prepared that shows the 110 acre undeveloped area, the proposed project site and the construction of the roads proposed in the EIR. Due to the topography of the site significant structures and grading are necessary to support the required street improvements.

In Summary the EIR among several significant impacts identified Grading as a significant impact. The Environmental Review Committee required the consideration of the cumulative impacts of development including the vacant parcels surrounding the site and related projects. Grading was anticipated and required for the construction of Pueblo Avenue and Pullman Street in addition to the onsite grading shown in Figure 4 of the EIR.

DATE	2023.03.02	BY	2023.03.02	CHK	2023.03.02
<p>WATERFORD SUBDIVISION</p> <p>SECTION 34.6</p> <p>ENGINEERS</p> <p>WATERFORD SUBDIVISION</p> <p>SECTION 34.6</p> <p>ENGINEERS</p>					

